



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

In Reply Refer To: 3AT23

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAR 10 1994

Dr. Charles G. Carson, III, Ph.D.
Vice President
Environmental Affairs
U.S. Steel
600 Grant Street
Pittsburgh, Pennsylvania 15219-2749

Re: Requirement to Provide Information Regarding
Implementation and Enforcement of National Emission
Standard for Coke Oven Batteries, 40 CFR Part 63,
Subpart L.

Dear Dr. Carson:

The purpose of this letter is to provide interim guidance for reporting requirements under the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Coke Oven Batteries at 40 CFR Part 63, Subpart L, as well as to establish a reporting format that will be uniformly applied to each source.

BACKGROUND

The NESHAP for Coke Oven Batteries, final rule (40 CFR Part 63, Subpart L) was published in the *Federal Register* on October 27, 1993. It is expected that this rule will be implemented and enforced by State and local authorities.

Pursuant to 40 CFR Part 63.309 (a) (5) (ii), EPA Region III officially notified U.S. Steel that EPA is the agency primarily responsible for implementation and enforcement of the rule until such time as delegation is granted to the appropriate state and/or local authorities. In its October 22, 1993 letter sent to all owners/operators of cokemaking facilities, EPA Region III indicated that, among other actions specified in the rule, the owners/operators are required to contract certified Method 303 observers to conduct performance tests and daily inspections of their coke oven batteries whenever EPA is the implementing agency. For sources choosing the "LAER extension track" (40 CFR §63.304), the daily inspections must begin on November 15, 1993. For sources choosing the early compliance "MACT track" (40 CFR §63.302), the daily inspections must start no later than December 31, 1995.

FILE COPY

EPA Region III has noted that all regional cokemaking facilities choosing the "LAER extension track" or choosing the "straddling" of both tracks option, in spite of unforeseen delays in promulgation of the final rule, initiated the Method 303 daily inspections on November 15, 1993, the statutory date. The U.S. Steel's adherence to the terms and time schedules of the rule under adverse conditions is appreciated.

COMPLIANCE DETERMINATION

As required at § 63.309(d), a compliance determination must be made for each day that a valid reading is obtained by a certified observer using Method 303. As required at § 63.309(e), the results of the daily monitoring must be made available the same day to the implementing authority and the calculation of the rolling average must be made available as soon as practicable. While the observation data may be summarized by the independent contractor, the compliance determinations may be made only by the enforcement authority. As stated above, until the enforcement authority is delegated the determinations will be done by Region III.

REPORTING REQUIREMENTS

In order to reduce the burden of daily transmitting and review of this information, Region III has chosen (with Headquarters concurrence) to make the determinations of daily compliance on a less frequent basis. Consequently, while the inspection information would still be collected on a daily basis, the actual compliance determination will be done on a monthly basis. This decision does not change the stringency of the rule since the information required to establish compliance will still be available for each day. Region III will review submitted data and make determination of the compliance status. The Region will also be checking submitted computations for the daily readings and 30-day rolling averages on a random basis.

In accordance with the above, during the first week of each month U.S. Steel shall submit to EPA Region III the data collected by certified observers for the preceding month. The submitted data shall include calculated daily values of the percent of the leaking doors, topside port lids, and offtake systems, as well as a set of five daily readings (or calculated logarithmic average of those 5 readings) of the seconds of visible emissions per charge for charging emissions. Computed 30-run rolling averages of the percent of the leaking doors, topside port lids and offtake systems and the 30-day (150 charges) rolling logarithmic averages of the seconds of visible emissions per charge for each of the 30 preceding days are also required to be a part of the submission. The requested monthly monitoring data shall be submitted for each battery separately under a common cover.

EPA Region III shall be notified within 24 hours if any of the computed 30-run rolling averages of the percent of the leaking doors, topside port lids and offtake systems and the 30-day rolling logarithmic averages of the seconds of visible emissions per charge for any day exceed limits specified by the rule. In addition, a copy of the inspector's field records pertaining to the particular violation for the preceding 30 days shall be made a part of the monthly monitoring report.

METHOD 303

Region III highly recommends that 30-run/day rolling averages be computed utilizing the Spreadsheet program developed specifically for Method 303 applications by EPA. The Spreadsheet program utilizes Version 2.3 of Lotus 123. The software (available on 3.5 inch diskettes) was provided to all the participants in the Method 303 Inspector Training and Certification Program. Since this program is the sole source for the training and certification of personnel acceptable to EPA to serve as the Method 303 certified inspectors, EPA Region III considers it safe to assume that U.S. Steel's contractor is in possession of this program. Should you have any questions concerning the utilization of the program or need for an extra copy of it, please contact Michael Ioff of Region III at (215) 597-9858.

A sample of the format for a monthly monitoring report for a single battery is enclosed. This format is automatically generated by the program every time the computer file for a particular battery is initially established and/or updated.

REPORTING PROCEDURES

Initially, monthly monitoring reports will be accepted via first class mail or by FAX. It is, however, expected that in the near future those reports will be submitted electronically using the "Technology Transfer Network" (TTN) established by the EPA's Office of Air Quality Planning and Standards (OAQPS). Through the TTN OAQPS provides information and technical support on air pollution control to EPA regional offices, state and local agencies, consultants, industry, and the general public. OAQPS TTN is a network of electronic bulletin boards that provides information and technology exchange in different areas of air pollution control. One of the features of the TTN is the Email which is used to send a message (with files if necessary) to other users.

The service is free of charge, except for the cost of using the phone. You access the network from a personal computer through a modem and standard communications software. In the near future, Region III will evaluate the need for introductory training for facilities/contractor personnel in order to familiarize them with the system.

COMPLIANCE CERTIFICATION REPORTS

The initial compliance certification report for the bypass/bleeder stack flare system or approved alternative control device or system, as required under § 63.307, must be submitted by May 15, 1994.

Semiannual compliance certification reports as required under § 63.311 must be submitted every 6 months beginning May 15, 1994.

EFFECTIVE DATE

This interim guidance for reporting requirements is effective immediately. The first submission of the monthly monitoring report for each eligible source (battery) for the month of February is due the week of March 1, 1994, or within two weeks of your receipt of this letter. Failure to provide the information required may result in the issuance of an Order requiring compliance or the initiation of a civil action pursuant to Section 113 (b) of the Clean Air Act, 42 U.S.C. § 7413(b).

Please submit monthly monitoring and compliance certification reports to:

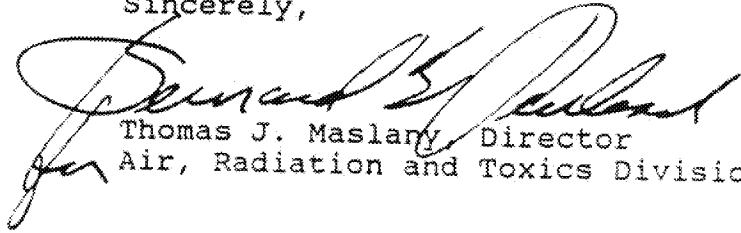
Bernard E. Turlinski, Chief
Air Enforcement Branch (3AT20)
U.S. EPA, Region III
841 Chestnut Building
Philadelphia, PA 19107

In addition, please note that Allegheny County Health Department has requested that a copy of each monthly monitoring and compliance certification report be sent to:

Ronald J. Chleboski, Deputy Director
Division of Air Quality
Bureau of Environmental Quality
Allegheny County Health Department
301 Thirty-ninth Street
Pittsburgh, PA 15201

If you should have any questions, please contact Denis Lohman, Chief, Case Development Section, at (215) 597-3024, or Michael Ioff, of his staff, at (215) 597-9858.

Sincerely,

A handwritten signature in dark ink, appearing to read "Thomas J. Maslany", is written over the typed name and title.

Thomas J. Maslany, Director
Air, Radiation and Toxics Division

Enclosure

cc: Mr. Ronald Chleboski
Mr. Joseph Pezze